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**AFFIDAVIT IN SUPPORT OF SEARCH WARRANTS**

Sean Kennedy, an agent with the Federal Bureau of Investigation (FBI) being duly sworn,  
states:

**ITEMS TO BE SEARCHED**

1. This affidavit is being submitted in support of an application pursuant to Title 18 U.S.C. § 2703 and Federal Rule of Criminal Procedure 41, to require Instagram, Facebook, and Google; to disclose to the government, records and other information in its possession, pertaining to the subscribers or customers associated with the Instagram, Facebook, and Google accounts bearing usernames: @fabiaguila (Instagram ID: 48257008, hereinafter the **Subject Instagram Account**); fabiaguila (Facebook ID: 100000956313000, hereinafter the **Subject Facebook Account**); giomontu@gmail.com (hereinafter **Subject Google Account 1**); and giocallefc@gmail.com (hereinafter **Subject Google Account 2**); listed in Attachment A, which is incorporated by reference, and collectively referred to as the **Subject Communication Accounts**. The information to be searched is described in the following paragraphs and in Attachment B, which is incorporated by reference herein. The **Subject Communication Accounts** are believed to contain and conceal items that constitute evidence of violations of Title 18 U.S.C. § 844(e), using a telephone or other instrument of interstate commerce to make a threat to kill, intimidate, or injure any individual or building by means of an explosive; Title 18 U.S.C. § 875(c), communicating in interstate commerce a threat to kidnap or injure another person; and using the Postal Service to deliver a threat to kidnap or injure another person, in violation of 18 U.S.C. § 876(c).

2. The applied for warrants would authorize the search of the **Subject Communication Accounts**, by members of the FBI, or their authorized representatives, including

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but not limited to other law enforcement agents assisting in the above described investigation.

### **AGENT BACKGROUND**

3. I am a Special Agent with the FBI and have been so since 2015. As such, I am an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Titles 18 and 21 of the United States Code.

4. During my employment as an FBI Agent, I have been assigned to investigate violations of federal law including bank robbery, Hobbs Act robbery, fugitives, and other violent crime. I have received training and I have gained experience in interviewing and interrogation techniques, arrest procedures, search warrant applications, the execution of searches and seizures, computer evidence identification, telephony, computer evidence seizure and processing, and various other criminal laws and procedures. Prior to my employment as an FBI agent, I worked as an instrumentation chemist for the FBI Terrorist Explosive Device Analytical Center for 18 months. I am currently assigned to the Baltimore Violent Crimes Task Force in Baltimore, Maryland.

5. Because this affidavit is being submitted for the limited purpose of establishing probable cause for a search warrant, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause. I have not, however, excluded any information known to me that would defeat a determination of probable cause. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, police officers, witnesses, cooperating sources, telephone records, and reports. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

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6. Based on my training, knowledge, and experience, I know that web based communication accounts, such as those provided by Instagram, Facebook, and Google, are an increasingly common way for people to communicate. Your affiant is further aware that Instagram and Facebook users often use the messaging and posting functions to provide alternate contact information, such as additional Instagram or Facebook accounts, e-mail accounts, phone numbers, and/or other social networking contact information in order to continue and facilitate their communications privately.

#### **INFORMATION ABOUT INSTAGRAM**

7. Instagram is an online and mobile photo-sharing, video-sharing, and social networking service that is available for free. Users create accounts, which allow users to share photos, video and messages, and control who can view their photos, videos, and comments.

#### **INFORMATION ABOUT FACEBOOK**

8. Facebook owns and operates a free-access social networking website of the same name that can be accessed at <https://www.facebook.com>. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the general public. Facebook asks users to provide basic contact and personal identifying information to Facebook, either during the registration process or thereafter. Users may join one or more groups or networks to connect and interact with other users who are members of the same group or network. Users can create profiles that include photographs, lists of personal interests, and other information. Facebook allows users to upload photos and videos, which may include any metadata such as location that the user transmitted when s/he uploaded the photo or video. Users can exchange private messages on Facebook with other users. If a user does not want to interact with another

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user on Facebook, the first user can “block” the second user from seeing his or her account. Facebook has a “like” feature that allows users to give positive feedback or connect to particular pages. Facebook has a search function that enables its users to search Facebook for keywords, usernames, or pages, among other things. Each Facebook account has an activity log, which is a list of the user’s posts and other Facebook activities from the inception of the account to the present. In addition to the applications described above, Facebook also provides its users with access to thousands of other applications (“apps”) on the Facebook platform. Facebook also retains Internet Protocol (“IP”) logs for a given user ID or IP address.

#### **INFORMATION ABOUT GOOGLE**

9. Google provides numerous free services to the users with a Google profile. Some of the services include Gmail, Google Talk, Google Wallet, Google+, Google Drive, Picasa Web Albums, and YouTube. Gmail is a web based email service. Google Talk is an instant messaging service that provides both text and voice communication. Google Talk conversation logs are saved to a “Chats” area in the user’s Gmail account. Google Wallet is a mobile payment system that allows its users to store debit cards, credit cards, loyalty cards, and gift cards, among other things, on their mobile phones. Google+ is a social networking service. Google Drive is a file storage and synchronization service, which provides users with cloud storage, file sharing, and collaborative editing. Picasa Web Albums is an image hosting and sharing web service that allows users with a Google account to store and share images for free. YouTube is a free video sharing website that allows users to upload, view, and share videos.

#### **PROBABLE CAUSE**

10. On August 22, 2016, a victim (Victim #1) submitted an online tip to the FBI Public

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Access Line to report she had received death threats via text message from the Baltimore, Maryland area. Victim #1 knew the subject as Gio Calle, his phone number to be 443-527-1659, and his Instagram name as @giocallefc. Below is sample of a text message, some of which is verbatim:

- a. Received July 11, 2016: "So was you really avoiding me? And I know your address too. So expect a letter from me soon LOL You stupid ass bitch. I'll fucking kill and your whole family bitch. I got a semiautomatic weapon and a knife and I will brutally murder you fuckin Mexican And fuck your dog too...Don't make me come out to Tucson and kill you. I have no problem cutting the throat of a human. Been wanting to kill someone since I was 6 years old lol...."

11. A search of law enforcement databases for telephone number 443-527-1659 returned a result for Stephen S. Hill, 1100 Lisadale Circle, Apartment 1C, Baltimore, Maryland 21228 (hereinafter the Subject Residence). A search of the Subject Residence in law enforcement databases returned a result for Stephen C. WILLIAMS-HILL, date of birth June 13, 1984. The Maryland Vehicle Administration (MVA) has a record for a male named Stephen Charles WILLIAMS-HILL, date of birth June 13, 1984, home address 1100 Lisadale Circle, Apartment 1C, Baltimore, Maryland 21228 (the Subject Residence), and provides a photograph for WILLIAMS-HILL.

12. An open source search for the Instagram account @giocallefc returned results for @fabiaguila (the **Subject Instagram Account**), previously named @fabiaguila84, @djarmerofc, and @giocallefc. Photographs posted by the user of Instagram account @fabiaguila include clear photographs of the user. A comparison of photographs of the user on Instagram account @fabiaguila and WILLIAMS-HILL's MVA photograph appear to show the

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same person. The public posts for Instagram account @fabiaguila84 indicates that the user lives in the Baltimore, Maryland area.

13. An open source search for Twitter account @giocalle84 returned results for @fabiaguila84, previously named @djarnero and @giocalle84. The public account information for Twitter account @fabiaguila84 includes the location Catonsville, Maryland. The public posts for Twitter account @fabiaguila84 include posts with Foursquare links that say, "I'm at Home Sweet Home (Catonsville, MD)," and "I'm at Catonsville Gateway Condominiums (Catonsville, MD)." Catonsville Gateway Condominiums is the name of the condominium complex for the Subject Residence. Foursquare is a local search-and-discovery service mobile app. Foursquare included a social networking feature where users could "check-in" at a location, which could allow the user to share their location with friends.

14. October 14, 2016, a member of Tucson Police Department (TPD) in Tucson, Arizona, responded to a call for a bomb threat at La Frontera Center, located at 4891 E. Grant Road, Tucson, Arizona 85712. The receptionist at La Frontera Center received four calls from an unknown caller. The caller asked to speak to the parent, Victim #2, of Victim #1. On one of the calls the caller said, "...if you don't get me to that bitch [Victim #2], I'm going to blow up La Frontera and kill everybody there. Do you understand me bitch?" On another call the caller said he would send bombs to Victim #2's house and to La Frontera. The caller went on to say that he would kill Victim #2, Victim #2's family, and then he would go on a killing spree at La Frontera.

15. Later the same day, TPD received a call from an unknown subject. The subject requested that TPD respond to Victim #1's residence. The subject said, "I'm coming to Arizona to sodomize, torture, kidnap her, her sister [Victim's name removed] and sell her mother, [Victim #2], to ISIS and blow up the fucking house and kill," them. The caller said, "If she doesn't call,

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I'm going to fucking crush," her and, "She's going to fucking die." The caller said to have Victim #1 call phone number 443-527-1659.

16. On October 17, 2016, Victim #1 came into a TPD substation after receiving a letter from "Gio." The return address stated it was from Stephen WILLIAMS-HILL, 1100 Lisadale Circle, #1C, Catonsville, Maryland 21228 (the Subject Residence). Victim #1 asked a member of TPD to open the letter. Contained within the letter was an un-rolled condom. The letter stated Victim #1 could not hide because WILLIAMS-HILL would track her down.

17. On October 20, 2016, an employee of La Frontera Center, contacted investigators regarding threats to Victim #2, as well as their company. The La Frontera Center employee informed investigators that beginning in September 2016, Victim #2 began to receive threats on her work voicemail and email.

18. On October 22, 2016, La Frontera Center provided investigators with access to review Victim #2's voicemail. Below is a sample of the received voicemails, some of which is verbatim:

- a. Received September 7, 2016 from phone number 443-527-1659: "You fucking piece of shit, how dare you not I give you a fucking letter and you don't fucking respond, you're going to get, you better pray I don't come to Tucson, I'm going to get you all, you know who this is, you don't know who I am, you better be careful with Gio bitch."
- b. Received October 5, 2016 from phone number 443-527-1659: "This is Gio, tell your fucking daughter to fucking call me...before I come to Arizona and kill you."
- c. Received October 5, 2016 from phone number 443-527-1659: "I'm going crush your daughter's mouth with my foot...[Victim #1's address removed] is the house

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that will be broken, that will be the house of broken glass.”

- d. Received October 6, 2016 from phone number 443-527-1659: “...better fucking call me back at 443-527-1659 unless you want your daughter to get kidnapped and end up dead somewhere in the desert in the fucking dark, do you hear me bitch, you fucking Taco Bell eating motherfucker, and don’t make me, don’t make me do something to your husband either, old ass bitch, bye.”
- e. Received October 6, 2016 from phone number 443-527-1659: “...I hope a pack of niggers kills your husband, I hope your house gets blown the fuck up you stupid bitch.”
- f. Received October 6, 2016 from phone number 443-527-1659: Caller imitates the sound of an automatic weapon and then says, “Want that to happen to your house bitch? Have your daughter call me, 443-527-1659, or else you’ll die too bitch.”
- g. Received October 6, 2016 from phone number 443-527-1659: “...I hope your daughter [Victim #]1 gets what’s coming to her, I wish I could come to Tucson and beat the fuck out of [Victim #1]...(unintelligible)...and cut her fucking throat, I want to fucking murder the hell out of your fucking daughter...”
- h. Received October 6, 2016 from phone number 443-527-1659: “And bitch, if you even thinking about calling the police and the FBI on me, I’ll sure as hell kill your whole family and the fucking dog too, better watch your back.”
- i. Received October 6, 2016 from phone number 443-527-1659: “...I’m coming for your daughter [Victim #1], I’m going to beat her ass, I’m going to break her neck, and I’m going to dismember her body...you’re going to lose one child...if she wants to continue to keep living that bitch she better call me.”



- j. Received October 6, 2016 from phone number 443-527-1659: "...if I ever see you, you better hope I don't set your house on fire...I wish I could murder your fucking daughter [Victim #1], I been wanted to murder someone since I was six years old, she'll be my first victim."
- k. Received October 7, 2016 from phone number 443-527-1659: "Hey [Victim #2], Ima kill you."
- l. Received October 7, 2016 from phone number 443-527-1659: "Hey [Victim #2], I'm coming for you...your daughter don't call me today, she'll be kidnapped next week."
- m. Received October 7, 2016 from phone number 443-527-1659: "To whom this may concern, tell [Victim #2], one of your people that work at La Frontera, that if her fucking daughter, [Victim #1], doesn't contact Gio Calle at 443-527-1659, both her, her and her daughter will be brutally fucking kidnapped and murdered, she better, you better give her this message, and that bitch better call, better call Mr. Calle back."
- n. Received October 19, 2016 from an unknown phone number: "Hey [Victim #2], oh so your daughter fucking called the cops on me, and so your daughter is fucking snitch, listen [Victim #2], I'm going to fucking kill your fucking daughter, your daughter,...unintelligible...your daughter's going to know not to fuck with me, and you fucking old bitch, how dare you hang up on me, nobody fucks with the great Gio Pedro Antonio Calle, you god damn low life Mexican, I don't give a fuck, and I'm going to blow up La Frontera with so many bombs everyone in there going to fucking die, and I'm going to fucking rape the hell out of your daughter so bad

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she'll be shitting out of her pussy, ay and [Victim's name removed] too, and I'm going to send another fucking letter, expect another letter, only reason I ain't send no letters is because I ran out of envelopes and I need buy some fucking more, your daughter, your daughter is no fucking angel, your daughter is a stank loose pussy ass ho, just like her worthless illegal immigrant welfare bum mama, and her punk ass pedophile daddy who fucks his own daughter, you better fucking call me [Victim #]2, 443-527-1659, or I will fucking come to Tucson and cut your fucking head off old fucking bitch."

- o. Received October 19, 2016 from an unknown phone number: "...the police fucking called me, you think the police gonna scare me, I don't give a fuck if I get arrested or not...I'm going to keep harassing you at your job too...I'm going to fucking enjoy when I beat your ass you old bitch...that condom letter, did you enjoy that? Your daughter missed out on some good ass fucking dick. Expect a phone call tomorrow."
- p. Received October 20, 2016 from an unknown phone number: "You're going down [Victim #2]...you daughter is going to especially get it...are the police really going to come after me?"

19. On October 24, 2016, La Frontera Center provided to investigators emails sent from giomontu84@gmail.com to Victim #2's work email. Some of the emails were also sent to Victim #3, a sibling of Victim #1 and a child of Victim #2. Below is a sample of the received emails, some of which is verbatim:

- a. Received September 13, 2016: "Fuck your daughters [Victim #2]. They will get hurt by the great God Asar."

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- b. Received September 13, 2016: "...He a punk wannabe that wishes he was me, the real Cuban G. [Victim #2], your gonna be sorry that [Victim #1] rejected me...Tell [Victim #3] I will step on her face lol."
- c. Received September 15, 2016: "Bitch, as long as I love, [Victim #3] and [Victim #1] will not be safe walking the streets. I will hunt them down like dogs."
- d. Received September 19, 2016: "Hey bitch. I'm coming for [Victim #1]. I might torture her to death lmao. Hope she gets raped by a pack of niggers, lol."

20. On October 25, 2016, investigators received Electronic Benefit Transfer (EBT) records for WILLIAMS-HILL. EBT records have WILLIAMS-HILL's home address as the Subject Residence and his phone number as 443-527-1695. The listed phone number of 443-527-1695 is likely from a typographical error, since investigators know WILLIAMS-HILL's phone number as 443-527-1659. The EBT records showed a transaction on WILLIAMS-HILL's EBT card at Lotte Plaza Market, located at 6600 Baltimore National Pike, Catonsville, Maryland 21228. Lotte Plaza Market is located approximately 500 feet from the Subject Residence.

21. The same day, surveillance was conducted on 1100 Lisadale Circle, Catonsville, Maryland 21228, the Subject Residence building. WILLIAMS-HILL was observed walking out of the Subject Residence building.

22. Later the same day, a Postal Inspector from the United States Postal Inspection Service contacted investigators regarding a prior information request about mail service at the Subject Residence. The Postal Inspector informed investigators that the names Stephen Hill, Montu, and Avila were inside the mailbox for the Subject Residence.

23. On November 1, 2016, United States Magistrate Judge Stephanie A. Gallagher signed an arrest warrant for WILLIAMS-HILL and a search warrant for the Subject Residence.

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24. On November 2, 2016, the search warrant for the Subject Residence was executed and WILLIAMS-HILL was arrested. The only resident of the Subject Residence was WILLIAMS-HILL. A Toshiba Laptop, Dell desktop computer, Sony PlayStation 3, a Kingston USB flash drive; and four DVDs and one CD; were recovered from the Subject Residence. Two envelopes, one addressed to Victim #1 and one addressed to Victim #2; two boxes of condoms, one of which had one condom missing; a Samsung Galaxy Note 4; and the box for the Samsung Galaxy Note 4; were also recovered from the Subject Residence. Marked on the label on the Samsung Galaxy Note 4 box was the international mobile equipment identity (IMEI). The IMEI is a number that is unique to each phone. Paperwork found with the box had the name Stephen Hill, the same IMEI assigned to the recovered phone, and phone number 443-527-1659.

25. In a subsequent post-*Miranda* interview, WILLIAMS-HILL admitted making the aforementioned threats. WILLIAMS-HILL confirmed that his phone number was 443-527-1659 and provided the name of his Facebook account "fabiaguilafo" (the **Subject Facebook Account**).

26. On November 9, 2016, Victim #2 provided a copy of a letter and envelope sent from WILLIAMS-HILL to Victim #1 and Victim #3. The return address on the envelope was torn but appeared to include the name Stephen Hill and Langley Park, Maryland. Below is a sample from the letter, some of which is verbatim:

- a. Your boy Gio "Da Man" Calle is back at again harassing y'all with this real fuckin talk...And [Victim #1], I fuckin impersonated your family on Twitter again...I saw those complaints you typed on the internet, using giomontu@gmail.com (**Subject Google Account 1**) and gicallefo@gmail.com (**Subject Google Account 2**)...I'm going to burn and cauterize your eyes so bad you'll be blind. [Victim #3] too. I'll sell your mother [Victim #2] and Grandma [name removed] to ISIS,

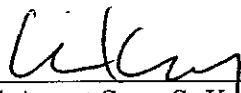
LMAO!!...Like I said, you will never be safe walking the streets [Victim #3] and [Victim #1]. You should always have one eye open, LMAO!! Unless you call me at 443-527-1659...Happy Birthday to your father...Maybe I'll injure him, and cut him up like a piece of meat.

27. Based on the foregoing, I submit there is probable cause to believe that Stephen Charles WILLIAMS-HILL has used a telephone or other instrument of interstate commerce to make a threat to kill, intimidate, or injure any individual or building by means of an explosive, in violation of 18 U.S.C. § 844(e); has communicated in interstate commerce a threat to kidnap or injure another person, in violation of 18 U.S.C. § 875(c); and has used the Postal Service to deliver a threat to kidnap or injure another person, in violation of 18 U.S.C. § 876(c); and that the **Subject Communication Accounts** contain evidence of that criminal activity.

### CONCLUSION

28. WHEREFORE, I respectfully request that the Court issue a warrant to require Instagram, Facebook, and Google, to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachments B to the warrant for the **Subject Communication Accounts** listed in Attachments A. Upon receipt of the information described in Section I of Attachments B, government-authorized persons will review that information to locate the items described in Section II of Attachments B.

Respectfully Submitted,

  
\_\_\_\_\_  
Special Agent Sean S. Kennedy  
Federal Bureau of Investigation

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Subscribed and sworn to before me on this 23 day of November, 2016.

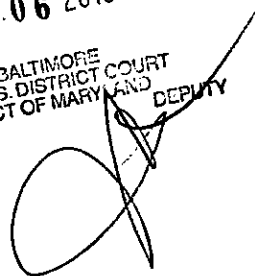
  
\_\_\_\_\_  
J. MARK COULSON  
UNITED STATES MAGISTRATE JUDGE



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LOGGED \_\_\_\_\_ RECEIVED \_\_\_\_\_

DEC 06 2016

AT BALTIMORE  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
BY \_\_\_\_\_ DEPUTY



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**ATTACHMENT A-1 (INSTAGRAM)**

**Property to Be Searched**

This warrant applies to information associated with the Instagram account:

1. Instagram User ID: @fabiaguilafo (Instagram ID: 48257008, the Subject Instagram Account);

that is stored at premises owned, maintained, controlled, or operated by Instagram, LLC, 1601 Willow Road, Menlo Park, CA 94025.

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**ATTACHMENT A-2 (FACEBOOK)**

**Property to Be Searched**

This warrant applies to information associated with the Facebook account:

1. Facebook user ID: “fabiaguilafe” (Facebook ID: 100000956313000, the Subject Facebook Account);

that is stored at premises owned, maintained, controlled, or operated by Facebook Inc., 1601 Willow Road, Menlo Park, CA 94025.



**ATTACHMENT A-3 (GOOGLE)**

**Property to Be Searched**

This warrant applies to information associated with the Google account:

1. Google User ID: giomontu@gmail.com (Subject Google Account 1); and
2. Google User ID: giocallefc@gmail.com (Subject Google Account 2);

that is stored at premises owned, maintained, controlled, or operated by Google, Inc., 1600 Amphitheatre Parkway, Mountain View, California 94043.

**ATTACHMENT B-1 (INSTAGRAM)**

**Particular Things to be Seized**

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**I. Information to be disclosed by Instagram, LLC**

To the extent that the information described in Attachment A-1 is within the possession, custody, or control of Instagram, LLC. ("Instagram"), including any messages, records, files, logs, or information that have been deleted but are still available to Instagram, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Instagram is required to disclose the following information to the government for the user ID listed in Attachment A-1 for the time period January 1, 2016 to present:

(a) All subscriber information, for the Target Account, including full name, user identification number, birth date, contact email addresses, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers, a PDF of the current status of the profile page;

(b) All photos and videos uploaded by the Target Account, and all photos and videos uploaded by any user that have a user of the Target Account tagged in them;

(c) All profile information; Mini-feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend or followers lists, including the user identification number of the friends or followers; groups and networks of which the user is a member, including group identification numbers; future and past event postings; rejected friend or follower requests; comments; gifts; pokes; tags; likes; and information about the users access and use of Instagram applications;

(d) All other communications and messages made or received by the user, including all private messages and pending friend or follower requests;

- (e) All IP logs, including all records of the IP addresses that logged into the account;
- (f) The length of service (including the start date), the types of service utilized by the user, and the means and source of any payments associated with the service (including any credit card or bank account number);
- (g) All privacy settings and other account settings, including privacy settings for individual Instagram posts and activities, and all records showing which Instagram users have been blocked by the account;
- (h) All “check ins” and other location information; and
- (i) All records pertaining to communications between Instagram and any person regarding the user or the users of the Instagram account, including contacts with support services and records of actions taken.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. § 844(e), 18 U.S.C. § 875(c), and 18 U.S.C. § 876(c) involving Stephen Charles WILLIAMS-HILL including, for each user ID identified on Attachment A-1, information pertaining to the following matters:

- (a) Evidence of threatening communications sent to or from the victims, plans and/or attempts to commit acts of violence, and plans and/or attempts to conceal acts of violence;
- (b) Evidence indicating how and when the Instagram account was accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the Instagram account owner;

(c) Evidence indicating the Instagram account owner's state of mind as it relates to the crime under investigation;

(d) The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s);

(e) The identity of the person(s) who communicated with the user ID about matters related to committing acts of violence, or membership in groups that promote and/or perpetrate such activity, including records about their identities and whereabouts; and

(f) Registration data to include the original IP address that was used to create the Target Account. Interests listed and any other user data created at the time the account was created.

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**ATTACHMENT B-2 (FACEBOOK)**

**Particular Things to be Seized**

**I. Information to be disclosed by Facebook Inc.**

To the extent that the information described in Attachment A-2 is within the possession, custody, or control of Facebook Inc. ("Facebook"), including any messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Facebook is required to disclose the following information to the government for the user ID listed in Attachment A-2:

(a) All contact and personal identifying information, including full name, user identification number, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers.

(b) All activity logs for the account and all other documents showing the user's posts and other Facebook activities;

(c) All photos and videos uploaded by that user ID and all photos and videos uploaded by any user that have that user tagged in them;

(d) All profile information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Facebook applications;

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- (e) All other records of communications and messages made or received by the user, including all private messages, chat history, video calling history, and pending “Friend” requests;
- (f) All “check ins” and other location information;
- (g) All IP logs, including all records of the IP addresses that logged into the account;
- (h) All records of the account’s usage of the “Like” feature, including all Facebook posts and all non-Facebook web pages and content that the user has “liked”;
- (i) All information about the Facebook pages that the account is or was a “fan” of;
- (j) All past and present lists of friends created by the account;
- (k) All records of Facebook searches performed by the account;
- (l) All information about the user’s access and use of Facebook Marketplace;
- (m) The types of service utilized by the user;
- (n) The length of service (including start date) and the means and source of any payments associated with the service (including any credit card or bank account number);
- (o) All privacy settings and other account settings, including privacy settings for individual Facebook posts and activities, and all records showing which Facebook users have been blocked by the account;
- (p) All Facebook accounts accessed by the browser(s) and device(s) associated with the Target Accounts as determined by the analysis of “cookies” and/or “machine cookies.”

(q) All records pertaining to communications between Facebook and any person regarding the user or the user's Facebook account, including contacts with support services and records of actions taken.

## **II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. § 844(e), 18 U.S.C. § 875(c), and 18 U.S.C. § 876(c) involving Stephen Charles WILLIAMS-HILL including, for each user ID identified on Attachment A-2, information pertaining to the following matters:

(a) Evidence of threatening communications sent to or from the victims, plans and/or attempts to commit acts of violence, and plans and/or attempts to conceal acts of violence;

(b) Evidence indicating how and when the Facebook account(s) was accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the Facebook account owner;

(c) Evidence indicating the Facebook account owner's state of mind as it relates to the crime under investigation;

(d) The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s);

(e) The identity of the person(s) who communicated with the user ID about matters related to committing acts of violence, or membership in groups that promote and/or perpetrate such activity, including records about their identities and whereabouts; and

(f) Registration data to include the original IP address that was used to create the Target Account. Interests listed and any other user data created at the time the account was created.

**ATTACHMENT B-3 (GOOGLE)**

**Particular Things to be Seized**

**I. Information to be disclosed by Google Inc.**

To the extent that the information described in Attachment A-3 is within the possession, custody, or control of Google Inc. ("Google"), including any messages, records, files, logs, or information that have been deleted but are still available to Google, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Google is required to disclose the following information to the government for the user ID listed in Attachment A-3 for the time period January 1, 2016 to present:

(a) The contents of all e-mails, attachments, voicemails, and chat messages stored in the accounts described in Attachment A-3, including copies of e-mails sent to and from the account, draft e-mails, the source and destination e-mails sent addresses associated with each e-mail, the date and time at which each e-mail was sent, and the size and length of each e-mail;

(b) All existing printouts from original storage of all of the electronic mail described above in Section I;

(c) All internet search data including all queries and location data;

(d) All transactional information of all activity of the electronic mail addresses described above in Section I, including log files, dates, times, methods of connecting, ports, dial ups, and/or locations;

(e) All records or other information stored by an individual using the account, including address books, contact and buddy lists, member profile, calendar data, pictures, and files;

(f) All records or other information regarding the identification of the account described above in Section I, to include application, full name, physical address, telephone



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numbers, and other identifiers, records of session times and durations, the date on which the account was created, the length of service, the types of service utilized, the IP address used to register the account, the log-in IP addresses associated with session times and dates, account status, alternative e-mail addresses provided during registration, all screen names associated with subscribers and/or accounts, all account names associated with the subscriber, methods of connecting, log files, means and source of payment (including any credit or bank account number), and detailed billing records;

(g) All records indicating the services available to subscribers of the e-mail address described above in Section I;

(h) Google+ subscriber information, circle information, including name of circle members, contents of posts, comments, and photos, to include date and timestamp;

(i) Google Drive files created, accesses, or owned by the accounts listed in Attachment A-3;

(j) YouTube subscriber information, private and public videos and files, private messages, and comments;

(k) Picasa Web Albums contents to include all images, videos and other files, and associated upload/download date and timestamp;

(l) Payment information, including billing address, shipping address, and payment instruments, associated with any Google Wallet or Google service used by the account listed in Attachment A-3;

(m) Google Talk conversation logs associated with the accounts listed in Attachment A-3; and

(n) Internet search history and location data.

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**II. Information to be seized by the government**

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. § 844(e), 18 U.S.C. § 875(c), and 18 U.S.C. § 876(c) involving Stephen Charles WILLIAMS-HILL including, for each user ID identified on Attachment A-3, information pertaining to the following matters:

(a) Evidence of threatening communications sent to or from the victims, plans and/or attempts to commit acts of violence, and plans and/or attempts to conceal acts of violence;

(b) Evidence indicating how and when the Google account(s) was accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the Google account owner;

(c) Evidence indicating the Google account owner's state of mind as it relates to the crime under investigation;

(d) The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s);

(e) The identity of the person(s) who communicated with the user ID about matters related to committing acts of violence, or membership in groups that promote and/or perpetrate such activity, including records about their identities and whereabouts; and

(f) Registration data to include the original IP address that was used to create the Target Account. Interests listed and any other user data created at the time the account was created.